

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	
Steven Allen Altland	:	Chapter 13
Debtor	:	
	:	Case No. 1:18-03301
U.S. Bank National Association	:	
For American General Mortgage Loan Trust	:	
Movant	:	
	:	Answer to
v.	:	Motion for Relief from Stay
	:	
Steven Allen Altland	:	
Respondent	:	

RESPONDENT'S REPLY TO MOTION FOR
RELIEF FROM AUTOMATIC STAY OF SECURED CREDITOR

AND NOW, this 7th day of December, 2018, comes the respondent, Steven Allen Altland, by and through counsel, the CGA Law Firm and E. Haley Rohrbaugh, Esquire, and does file the within response averring that:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. The exhibits speak for themselves.
5. Denied.
6. It is admitted that the Debtors have failed to make certain post-petition mortgage payments because of some financial difficulties, however, Debtor is not privy.
7. Denied.
8. Denied. Debtor is without knowledge as to whether, and to the extent which, Movant has incurred legal expenses.

9. While it is admitted that there is some delinquency. Debtor wishes to discuss entering into a Stipulation to resolve any delinquency and seek a loan modification.

WHEREFORE, it is requested that the relief sought not be granted.

Respectfully submitted,
CGA Law Firm

/s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire
Sup. Ct. I.D. No. 323803
Counsel for Debtor
135 North George Street
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(717) 848-4900

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<u>CERTIFICATE OF SERVICE</u>		

I hereby certify that on December 7, 2018, service upon all interested parties indicated below was made by sending a true and correct copy of the Answer to Motion for Relief, by ECF and/or regular US Mail, postage prepaid, upon:

Charles J. DeHart, III, Esquire
Chapter 13 Trustee
ECF

James C. Warmbrodt, Esquire
KML Law Group
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106

/s/ E. Haley Rohrbaugh
E. Haley Rohrbaugh, Esquire